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Attorneys for Dell Marketing, L.P.

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

**SEARS HOLDINGS CORPORATION, *et al.*,
Debtors.**

Chapter 11

Case No. 18-23538 (RDD)

(Jointly Administered)

**NOTICE OF RECLAMATION DEMAND
OF DELL MARKETING, L.P.**

PLEASE TAKE NOTICE that, by and through counsel, Dell Marketing, L.P. (“Dell”) hereby files this notice of the delivery of written demand for reclamation of goods pursuant to 11 U.S.C. § 546(c), upon Debtors Sears Holdings Corporation, Sears, Roebuck and Co., and Sears Home Improvement Products, Inc. (“Sears”) and Debtors’ counsel, to reclaim certain assets (the “Goods”) that are subject to reclamation. The Goods were sold in the ordinary course of Dell’s business and delivered on credit terms to, and received by, Sears during the forty-five (45) days prior to filing of its bankruptcy petition. Dell attaches as **Exhibit 1** and incorporates by reference herein a copy of its formal reclamation demand dated November 5, 2018 to Sears

Holdings Corporation. Dell attaches as **Exhibit 2** and incorporates by reference herein a copy of its formal reclamation demand dated November 5, 2018 to Sears, Roebuck and Co. Dell attaches as **Exhibit 3** and incorporates by reference herein a copy of its formal reclamation demand dated November 5, 2018 to Sears Home Improvement Products, Inc.

PLEASE TAKE FURTHER NOTICE that Dell reserves all of its right and remedies available under the United States Bankruptcy Code, including the right to supplement this notice.

Dated: November 5, 2018

Respectfully submitted,

By: /s/ Jonathan A. Grasso

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ATTORNEYS FOR DELL MARKETING, L.P.

CERTIFICATE OF SERVICE

The undersigned hereby certified that a true and correct copy of the foregoing instrument has been served on this 5th day of November, 2018 via first class mail, postage pre-paid upon the parties listed below, and electronically via the Court's CM/ECF system upon all parties requesting service via ECF notification:

Honorable Judge Robert D. Drain
U.S. Bankruptcy Court
Southern District of New York
300 Quarropas Street, Room 248
White Plains, NY 10601

Sears Holdings Corporation
Attn: Stephen Sitley and Luke Valentino
3333 Beverly Road
Hoffman Estates, IL 60179

Ray C. Schrock
Jacqueline Marcus
Garret A. Fail
Sunny Singh
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Office of the United States Trustee
Attn: Paul Schwartzberg
U.S. Federal Office Building
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New York, NY 10014

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/s/ Sabrina L. Streusand
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